

Lawrence J. Joseph (SBN 154908)
 Law Office of Lawrence J. Joseph
 1250 Connecticut Ave, NW, Suite 700-1A
 Washington, DC 20036
 Tel: 202-355-9452
 Fax: 202-318-2254
 Email: ljoseph@larryjoseph.com

Counsel for Movant Immigration Reform Law Institute

**IN THE UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

Innovation Law Lab, *et al.*,
Plaintiffs,
 v.
 Kirstjen Nielsen, *et al.*,
Defendants.

) **Civil Action No. 3:19-cv-0807-RS**
)
) **NOTICE OF MOTION AND MOTION**
) **OF IMMIGRATION REFORM LAW**
) **INSTITUTE FOR LEAVE TO FILE AN**
) **AMICUS CURIAE BRIEF IN SUPPORT**
) **OF FEDERAL DEFENDANTS IN**
) **OPPOSITION TO INTERIM RELIEF**
) **NO HEARING NOTICED**
)
) Complaint filed: February 14, 2019
) Honorable Richard Seeborg

PLEASE TAKE NOTICE that movant Immigration Reform Law Institute (“IRLI”) respectfully moves this Court for leave to file the accompanying *amicus curiae* brief in support of the federal defendants and their opposition to the plaintiffs’ motion for a temporary restraining order. As a motion for administrative relief, Local Rule 7-11 does not require a hearing for this motion. No hearing has been set for the plaintiffs’ underlying motion, and no hearing appears necessary of IRLI’s motion for leave to file. The parties consented to the filing of IRLI’s *amicus* brief.

At the hearing on plaintiffs’ motion for interim relief, this Court will review jurisdiction

1 over plaintiffs' claims and their entitlement to interim relief (*i.e.*, plaintiffs' likelihood of
2 prevailing, irreparable harm, the balance of equities, and the public interest). The *amicus* brief
3 that is the subject of IRLI's motion covers those same issues.

4 IRLI is a nonprofit 501(c)(3) public-interest law firm incorporated in the District of
5 Columbia. IRLI is dedicated to litigating immigration-related cases on behalf of, and in the
6 interests of, United States citizens and legal permanent residents and to assisting courts in
7 understanding and accurately applying federal immigration law. IRLI has litigated or filed
8 *amicus* briefs in many important immigration cases. For more than twenty years, the Board of
9 Immigration Appeals has solicited *amicus* briefs drafted by IRLI staff from IRLI's affiliate, the
10 Federation for American Immigration Reform, because the Board considers IRLI an expert in
11 immigration law. For these reasons, IRLI has direct interests in the issues here.

13 For the foregoing reasons, this Court should grant leave to file IRLI's *amicus* brief.

14 Dated: March 5, 2019

Respectfully submitted,

16 /s/ Lawrence J. Joseph

17

Lawrence J. Joseph (SBN 154908)

18 Law Office of Lawrence J. Joseph
19 1250 Connecticut Ave, NW, Suite 700-1A
20 Washington, DC 20036
21 Tel: 202-355-9452
22 Fax: 202-318-2254
23 Email: ljoseph@larryjoseph.com

24 *Counsel for Movant*

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2019, I electronically filed the foregoing motion for leave to file together with the accompanying *amicus curiae* brief, with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Notice of this filing will be sent by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Lawrence J. Joseph

Lawrence J. Joseph (SBN 154908)

Law Office of Lawrence J. Joseph
1250 Connecticut Ave, NW, Suite 700-1A
Washington, DC 20036
Tel: 202-355-9452
Fax: 202-318-2254
Email: ljoseph@larryjoseph.com

Counsel for Movant